

EXHIBIT D

So Ordered.



Frederick P. Corbit

Frederick P. Corbit
Bankruptcy Judge

Dated: September 14th, 2020

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON

In Re:

No. 18-03197-11

GIGA WATT, INC.,

**STIPULATED ORDER PRESERVING
PRIVILEGE PURSUANT TO FRE 502(d)**

Debtor.

Based on the stipulation of the parties filed on September 11, 2020 (ECF No. 706), and pursuant to Federal Rule of Evidence 502(d), the Court hereby ORDERS as follows:

Any production of documents and/or provision of information by Perkins Coie LLP in this matter to the Chapter 11 Trustee in the above-captioned case (the "Trustee") or his counsel does not and shall not constitute a waiver of the attorney-client privilege or any other privilege or protection that applies or may apply to such documents or information, both as to any documents or information produced to the Trustee and as to any other documents or information subject to a claim of privilege in Perkins Coie LLP's possession, whether in this proceeding or in any other federal or

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 1

BYRNES ♦ KELLER ♦ CROMWELL LLP
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SEATTLE, WASHINGTON 98104
(206) 622-2000

1 state proceeding. Perkins Coie LLP may make any such production to the Trustee
2 pursuant to this Court's "Order Regarding Production of Documents Responsive to
3 Rule 2004 Order and Placing Limits on the Use of Confidential Information in Such
4 Documents." ECF No. 673.

6 IT IS SO ORDERED.

8 ///END OF ORDER///

9 Presented by:

10 BYRNES KELLER CROMWELL LLP

POTOMAC LAW GROUP

11 By /s/ Bradley S. Keller

By /s/ Pamela M. Egan

12 Bradley S. Keller, WSBA #10665

Pamela M Egan, WSBA #54736

13 By /s/ Ralph E. Cromwell, Jr.

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21 *Attorneys for Perkins Coie LLP*

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 2

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 11th day of September, 2020, I electronically filed
3 the foregoing with the Clerk of the Court using the CM/ECF System, which in turn
4 automatically generated a Notice of Electronic Filing (NEF) to all parties in the case
5 who are registered users of the CM/ECF system. The NEF for the foregoing
6 specifically identifies recipients of electronic notice.

7 By /s/ Ralph E. Cromwell, Jr.

8 Ralph E. Cromwell, Jr.

9 *Attorneys for Plaintiffs*

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STIPULATED ORDER PRESERVING PRIVILEGE
PURSUANT TO FRE 502(d) - 3

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